U.S. Government Announces Largest Expansion of the UFLPA Entity List in History, Continues Focus on Forced Labor Trade Enforcement

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What was announced?

The Trump Administration today announced the largest expansion of the Uyghur Forced Labor Prevention Act (UFLPA) Entity List in history, with 43 new additions, bringing the total number of entities to 187. Today's announcement, through a pre-publication Federal Register notice on that is scheduled for official publication on August 3, 2026, was also the first expansion of the UFLPA Entity List under the Trump administration and the first since January 15, 2025.

What does this mean for companies sourcing from outside the U.S.?

The UFLPA Entity List is a compilation of entities determined by the U.S. government's Forced Labor Enforcement Task Force (FLETF) to violate the UFLPA. Shipments containing inputs or components from any of the 187 Entity Listed companies are deemed by U.S. Customs and Border Protection (CBP) to be produced with forced labor and prohibited from entry into the United States. There is no de minimis exemption for these forced labor inputs; any amount traceable to these entities can warrant CBP detention of an entire shipment. In addition, shipments from non-listed companies that CBP traces to these Entity Listed companies based on supply chain or corporate connections are a likely target for UFLPA detentions. All companies importing into the United States are advised to conduct traceability analyses of their key product supply chains to ensure there is no connection to listed entity.

Kelley Drye's Forced Labor Trade Practice conducts enhanced due diligence assessments for clients that model the same vectors of risk and connections to UFLPA listed entities that CBP uses in its tracing and detentions under the law. With this information, companies can make sourcing decisions to avoid costly UFLPA detentions before they occur. With these significant updates to the UFLPA Entity List, we also advise companies who have previously undertaken UFLPA enhanced due diligence screenings to conduct updated screenings to ensure the absence of connections to these newly disclosed vectors of risk.

In the four years of the UFLPA's existence, roughly US $4 billion in shipments have been detained under the law. While the value of shipments has decreased over time, reflecting a diversification in detentions beyond the initial high-value focus on the solar industry, the number of detentions has remained fairly consistent, at about 900 detained shipments per month across fiscal years. A significant number of shipments have been detained from Malaysia, Vietnam, Thailand, India, Mexico, Laos, Ethiopia, and Indonesia, in addition to direct shipments from China, demonstrating that CBP is tracing shipments and supply chains across borders.

Which entities were included in today's announcement?

Four entities will be added under the list of entities working with the government of Xinjiang to recruit, transport, transfer, harbor or receive forced labor or Uyghurs, Kazakhs, Kyrgyz, or members of other persecuted groups out of Xinjiang:

1. Xinjiang Communications Construction Group Co., Ltd.
2. Xinjiang Nuziline Bio-Pharmaceutical Co., Ltd. (also known as Xinjiang Xinziyuan Biopharmaceutical Co., Ltd.)
3. Xinjiang Tianyun Organic Agriculture Co., Ltd.
4. Zhengzhou Synear Food Co., Ltd.

An additional 41 entities will be added under the list which identifies facilities and entities that source material from the Xinjiang Uyghur Autonomous Region or from persons working with the government of Xinjiang or the Xinjiang Production and Construction Corps for purposes of the "poverty alleviation" program or the "pairing assistance" program or any other government labor scheme that uses forced labor:

1. Alar Nanjiang Carbon New Material Co., Ltd.
2. Aksu Aodu Sugar Industry Co., Ltd.
3. Baiyin Nonferrous Group Co., Ltd. (also known as Baiyin Nonferrous; and BNMC; and formerly known as Baiyin Nonferrous Metals Company)
4. Baoji Jucheng Titanium Industry Co., Ltd.
5. Chacha Food Company, Limited (also known as Chacha Food Co., Ltd.; Qia Qia Food; and Chia Chia Food Co., Ltd.)
6. Chalkis Health Industry Co., Ltd. (formerly known as Xinjiang Chalkis Co., Ltd.)
7. Fujian Septwolves Industry Co., Ltd. (also known as Septwolves)
8. Guangxi Kelun Pharmaceutical Co., Ltd.
9. Henan Guorong Electronic Technology Co., Ltd. (also known as Goroe; and Guorong Shares)
10. Henan Tongzhou Cotton Industry Co., Ltd.
11. Hunan Aihua Group Co., Ltd. (also known as Aihua Group; and AiSHi)
12. Jiangsu Tiangong Technology Co., Ltd.
13. Jiangyin Xinren Aluminum Foil Technology Co., Ltd. (also known as Xinren Aluminum Foil)

14. Jiangyin Xinren Aluminum Technology Co., Ltd. (also known as Xinren Aluminum)
15. Kashgar Aodu Sugar Industry Co., Ltd.
16. Kashgar Jiangguoguo Agricultural Technology Co., Ltd. (also known as Jiangguoguo)
17. Nanjing Lilai Pharmaceutical Technology Co., Ltd.
18. SDIC Xinjiang Lithium Industry Co., Ltd.
19. SDIC Xinjiang Luobupo Potash Co., Ltd. (also known as SDIC Xinjiang Lop Nur Potash Co., Ltd.)
20. Shandong Gold Mining Co., Ltd. (also known as Shandong Gold)
21. Shandong Gold Smelting Co., Ltd.
22. Shandong Weiqiao Pioneering Group Co., Ltd. (also known as Shandong Weiqiao Chuangye Group Co., Ltd.; Shandong Weiqiao Venture Co., Ltd.)
23. Shandong Weiqiao Textile Technology Co., Ltd.
24. Shihezi Xinren Battery Aluminum Foil Technology Co., Ltd.
25. TBEA Co., Ltd.
26. Tefeng Pharmaceutical Co., Ltd. (also known as Tefeng Pharmaceutical; and formerly known as Tefeng Health Technology Co., Ltd.)
27. Tianshan Aluminum Group Co., Ltd. (formerly known as Shimge Pump Industry Group Co., Ltd.)
28. Xinjiang Baiyin Mining Development Co., Ltd.
29. Xinjiang Biochemical Pharmaceutical Co., Ltd.
30. Xinjiang Huashidan Pharmaceutical Co., Ltd.
31. Xinjiang Jinchuan Mining Industry Co., Ltd. (also known as Xinjiang Jinchuan Company)
32. Xinjiang Nuziline Bio-Pharmaceutical Co., Ltd. (also known as Xinjiang Xinziyuan Biopharmaceutical Co., Ltd.)
33. Xinjiang Production and Construction Corps Eighth Division Tianshan Aluminum Co., Ltd. (also known as Tian Aluminum Co., Ltd.)
34. Xinjiang Tefeng Pharmaceutical Industry Co., Ltd.
35. Xinjiang Tianchi Energy Co., Ltd.
36. Xinjiang Tianhongji Technology Co., Ltd. (formerly known as Xinjiang Tianhongji Silicon Industry Co., Ltd.)
37. Xinjiang Tianshan Snow Lotus Pharmaceutical Co., Ltd.
38. Xinjiang Tianshan Yingda Carbon Co., Ltd.
39. Xinjiang Tianyun Organic Agriculture Co., Ltd.

40. Xinjiang Tianzhan New Material Technology Co., Ltd.

41. Yili Chuanning Biotechnology Co., Ltd. (also known as Twinings Bio; and CN BIO)

The names of two entities appear on both lists (Xinjiang Yianyun Organic Agriculture Co., Ltd. and Xinjiang Nuziline Bio-Pharmaceutical Co., Ltd.), indicating that the FLETF found those entities to fulfill multiple criteria for inclusion on the Entity List.

Of the 43 additions, 19 are located outside of Xinjiang. This is significant because shipments from these 19 entities which have no Xinjiang-origin inputs may now be detained and will have difficulty clearing detention. The addition of these 19 entities is also notable in that it underscores that entities elsewhere in China that source material from Xinjiang or use transferred Uyghur workers are being tracked by CBP for violation of the UFLPA. Kelley Drye uses state of the art technologies to track both labor transfers and sourcing practices, including outside of Xinjiang, in order to help clients stay abreast of these evolving areas of risk.

Today's additions cut across a variety of pharmaceutical products, food products, textile and apparel products, and metals and minerals products. Nine of the listed entities produce pharmaceutical products, including four that specifically produce conjugated estrogen (used to treat menopause symptoms). Of the seven food-producing entities listed, two produce sugar beet-based products including molasses, one produces salmon products, and one produces frozen foods including frozen dumplings and wontons. Four listed entities impact U.S. textile and apparel importers, and the remaining 23 entities produce raw materials with broader ranges of manufacturing applications such as aluminum, carbon, gold, and titanium.

What is the big picture here?

Today's announcement continues the Trump Administration's focus on forced labor trade enforcement as a critical component of its broader trade enforcement agenda. Since January 2025, the U.S. government has detained over 13,000 shipments, valued at nearly $229 million, under the UFLPA. Of these, 63% of detained shipments have ultimately been denied entry by CBP. During this same period, CBP has issued nine Withhold Release Orders (WROs) regarding identification of reasonable but not conclusive indicators of forced labor, unrelated to the UFLPA, under Section 307 of the Tariff Act of 1930. The Biden Administration issued an average of two WROs per year. Today's announcement also comes on the heels of the Trump Administration's imposition of 10-12.5% tariffs on 60 economies under Section 301 of the Trade Act of 1974. Thus far, 15 economies subject to this Section 301 investigation and resulting tariffs have passed or implemented their own forced labor import prohibition. As the scale of global forced labor trade enforcement continues to expand, companies are advised to prioritize sourcing and traceability practices that will mitigate the risk of detentions and disruptions. Kelley Drye's Forced Labor Trade practice can help.